

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

CHRIS MARTIN,  
*Plaintiff,*

v.

CLEVELAND CITY COUNCIL, *et al.*,  
*Defendants.*

Case No. 1:23-CV-2312

Judge Charles Esque Fleming

**NOTICE OF ACCEPTANCE  
OF OFFER OF JUDGMENT**

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PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68**

Pursuant to Fed. R. Civ. P. 68, Plaintiff Chris Martin (“Mr. Martin”) hereby provides written notice of his acceptance of the Offer of Judgment made by Defendants Cleveland City Council and Blaine Griffin (collectively “Defendants”).

1. On December 4, 2023, Mr. Martin began his above-captioned action against Defendants Cleveland City Council and Blaine Griffin, alleging violations of his civil rights under federal law.
2. On January 23, 2024, Defendants served an Offer of Judgment in the amount of \$500.00. *See* Exhibit A. (hereinafter, the “Offer”). The Offer provides, *inter alia*, for judgment to be entered against the City of Cleveland. Further, it provides that Mr. Martin receive \$500.00 and that he receive reasonable attorneys’ fees, expenses, and costs as of the date of the Offer, in an amount to be determined by the Court in a hearing, in satisfaction of his claims against Defendants. *See id.*

3. On February 6, 2024, Mr. Martin served this written notice of acceptance of the Offer under Rule 68 on counsel for Defendants by electronic mail.

WHEREFORE, Mr. Martin respectfully prays that judgment be entered against Defendants on the terms specified in the Offer and stipulates to the voluntary dismissal, with prejudice, of his claims against Cleveland City Council and Blaine Griffin.

Respectfully submitted,

/s/ Andrew Geronimo

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**First Amendment Clinic**

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*Attorneys for Plaintiff Chris Martin*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served upon counsel for Defendants via electronic mail this 6th day of February 2024 to the following addresses:

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*Attorneys for Defendants*

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